

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LAWRENCE HARTFORD; DOUGLAS MITCHELL; BRETT BASS; SPORTING SYSTEMS VANCOUVER, INC.; SECOND AMENDMENT FOUNDATION, INC.; AND FIREARMS POLICY COALITION, INC.,

| NO. 3:23-cv-05364-RJB

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
ANSWER**

Plaintiffs,

V.

BOB FERGUSON, in his official capacity as Washington State Attorney General, et al.,

Defendants.

I. STIPULATION

The Parties, by and through their respective attorneys of record, hereby stipulate to the following:

1. Under Federal Rule of Civil Procedure 12(a) Defendants' answers are due 21 days after service of the Complaint, or 60 days if the Defendants timely waived service under Rule 4(d) after the request for a waiver was sent.

2. Plaintiffs have filed a motion for a preliminary injunction (ECF No. 10).

3. It would not prejudice Plaintiffs to extend Defendants' deadline to respond until after the Motion for Preliminary Injunction is heard by this Court. Accordingly, the Parties

1 stipulate that Defendants and proposed Intervenor-Defendant Alliance for Gun Responsibility
2 may answer, or otherwise respond to Plaintiffs' complaint, no later than 21 calendar days after
3 (1) service is completed or (2) the date on which Plaintiffs' Motion for Preliminary Injunction is
4 ruled on by this Court, whichever is later. To the extent, any of the Defendants timely waived
5 service under Fed. R. Civ. P. 4(d), those Defendants may answer, or otherwise response to
6 Plaintiffs' complaint, no later than (1) 60 calendar days after the request for waiver was sent or
7 (2) 21 days from the date on which Plaintiffs' Motion for Preliminary Injunction is ruled on by
8 this Court, whichever is later.

9

10 DATED this 16th day of May, 2023.

11 ROBERT W. FERGUSON
12 Attorney General

13 *s/ Andrew R.W. Hughes*
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18 s/ Joel B. Ard
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20 *Attorney for Plaintiffs*

21 CHAD M. ENRIGHT
22 Kitsap County Prosecuting Attorney

23 s/ Christine Palmer
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25 Senior Deputy Prosecuting Attorney
26 *Attorney for Defendants Chad M. Enright &*
John Gese

II. ORDER

IT IS HEREBY ORDERED:

That the stipulation of the Parties is APPROVED AND ADOPTED. Defendants' and proposed Intervenor-Defendant Alliance for Gun Responsibility's deadline for responding to Plaintiffs' Complaint (Dkt. # 1) under Federal Rule of Civil Procedure 12 is extended to no later than 21 calendar days after (1) service is completed or (2) the date on which Plaintiffs' Motion for Preliminary Injunction is ruled on by this Court, whichever is later. To the extent, any of the Defendants timely waived service under Fed. R. Civ. P. 4(d), those Defendants may answer, or otherwise respond to Plaintiffs' complaint, no later than (1) 60 calendar days after the request for waiver was sent or (2) 21 days from the date on which Plaintiffs' Motion for Preliminary Injunction is ruled on by this Court, whichever is later.

DATED this _____ day of _____, 2023.

The Honorable Robert J. Bryan
United States District Judge

1 **DECLARATION OF SERVICE**

2 I hereby declare that on this day I caused the foregoing document to be electronically
3 filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of
4 this document upon all counsel of record.

5 DATED this 16th day of May, 2023, at Seattle, Washington.

6

s/ Andrew R.W. Hughes
7 ANDREW R.W. HUGHES, WSBA #49515
8 Assistant Attorney General